

AB:ANR

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. §§ 1951, 924(c) and 2)

ANGEL MOHAMMED AND GRANT  
MOHAMMED,

22-MJ-979

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

MEGAN M. QUINN, being duly sworn, deposes and states that he is a <sup>S</sup> ~~Detective~~ <sup>Special Agent</sup> ~~with the New York City Police Department ("NYPD")~~ <sup>ATF member 9/9/2022</sup>, duly appointed according to law and acting as such.

Count One: Hobbs Act Robbery

On or about September 8, 2022, within the Eastern District of New York and elsewhere, the defendants ANGEL MOHAMMED and GRANT MOHAMMED did knowingly and intentionally obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of a deli at 17-21 Seagirt Boulevard in Queens, New York.

(Title 18, United States Code, Sections 1951 and 2)

Count Two: Possession of a Firearm

On or about September 8, 2022, within the Eastern District of New York and elsewhere, the defendants ANGEL MOHAMMED and GRANT MOHAMMED did use or carry

a firearm in furtherance of a crime of violence, to wit, the robbery of a deli at 17-21 Seagirt Boulevard in Queens, New York.

(Title 18, United States Code, Sections 924(c) and 2)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). I have been with ATF since September 2005. I have been assigned to the Joint Robbery Task Force (the "Task Force") since 2017. I have been involved in the investigations of numerous cases involving Hobbs Act robberies and related firearms offenses.

2. On or about September 8, 2022, at approximately 5:35pm, law enforcement officers received an alert about a robbery at a deli that sells marijuana and CBD products (the "Deli") located at 17-21 Seagirt Boulevard in Queens, New York. Officers responded to the scene. From viewing video surveillance of the robbery that occurred in the Deli, detectives were able to identify the individuals who committed the robbery as ANGEL and GRANT MOHAMMED because the detectives are familiar with their identities through dozens of prior interactions with them over the past several years, including as recently as approximately 5 months ago.

3. Review of the video surveillance showed ANGEL and GRANT MOHAMMED enter the Deli and approach the counter. ANGEL and GRANT MOHAMMED spoke with an employee of the Deli ("Employee 1"). Employee 1 then took out a small bag of marijuana from behind the counter and ANGEL and GRANT MOHAMMED then smelled it. ANGEL

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

MOHAMMED took the bag of marijuana from Employee 1 and passed it to GRANT MOHAMMED who put it in his pocket.

4. ANGEL and GRANT MOHAMMED then attempted to exit the Deli. Two other Deli employees ("Employee 2" and "Employee 3") attempted to stop ANGEL and GRANT MOHAMMED from exiting the Deli because they had not paid for the marijuana.

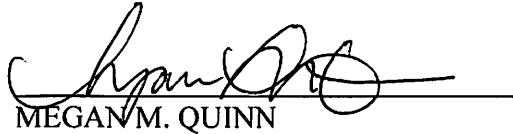
5. Employee 2 and Employee 3 and ANGEL and GRANT MOHAMMED then had a physical altercation. During this physical altercation, GRANT MOHAMMED swung a cane at Employee 2 and Employee 3. GRANT MOHAMMED hit Employee 2 with the cane and caused a laceration to his hand.

6. As the physical altercation further escalated, ANGEL MOHAMMED pulled out a firearm. ANGEL MOHAMMED pointed the firearm at both Employee 2 and Employee 3. ANGEL MOHAMMED also took Employee 3's phone and threw it. Employee 2 and Employee 3 then backed away from GRANT and ANGEL MOHAMMED. GRANT and ANGEL MOHAMMED then fled the scene.

7. Detectives conducted a photo array individually with Employee 2 and Employee 3. Each person positively identified ANGEL MOHAMMED from the photo array. Employee 2 also positively identified GRANT MOHAMMED.

8. Following a radio alert, law enforcement officers then drove to an address (the "Mohammed Residence") where ANGEL and GRANT MOHAMMED reside to canvass the area. ANGEL MOHAMMED was standing in the front yard of the Mohammed Residence wearing the same black sweatpants with "POLO" written on the left leg and then quickly went back inside. Detectives later entered the Mohammed Residence and arrested ANGEL and GRANT MOHAMMED.

9. WHEREFORE, your deponent respectfully requests that the defendant ANGEL MOHAMMED and GRANT MOHAMMED be dealt with according to law.

A handwritten signature in black ink, appearing to read "Megan M. Quinn", is written over a horizontal line.

MEGAN M. QUINN

Special Agent

Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me this  
9<sup>th</sup> day of September, 2022

A handwritten signature in black ink, appearing to read "Lois Bloom", is written over a horizontal line.

THE HONORABLE LOIS BLOOM  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK